

**UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF TEXAS  
LUBBOCK DIVISION**

LEONID GOLDSTEIN

*Plaintiff*

v.

CLIMATE ACTION NETWORK, CERES INC.,  
ROCKEFELLER BROTHERS FUND INC., GENERATION  
INVESTMENT MANAGEMENT LLP, FORD FOUNDATION, THE  
PEW CHARITABLE TRUSTS, GREENPEACE INTERNATIONAL  
CORP., ENVIRONMENTAL GRANTMAKERS ASSOCIATION CORP.,  
THE CONSULTATIVE GROUP ON BIOLOGICAL DIVERSITY CORP.,  
THE SIERRA CLUB FOUNDATION CORP., WORLD WIDE FUND  
FOR NATURE TRUST, US CLIMATE ACTION NETWORK CORP.,  
GLOBAL CALL FOR CLIMATE ACTION CORP., GENERATION  
INVESTMENT MANAGEMENT US LLP, ALLIANCE FOR CLIMATE  
PROTECTION CORP., FENTON COMMUNICATIONS CORP.,  
WORLD WILDLIFE FUND INC., GREENPEACE INC., GREENPEACE  
FUND INC., FRIENDS OF THE EARTH INTERNATIONAL CORP.,  
FRIENDS OF THE EARTH US CORP., FRIENDS OF THE EARTH  
(ACTION) INC., ENVIRONMENTAL DEFENSE FUND INC.,  
ENVIRONMENTAL DEFENSE ACTION FUND CORP., NATURAL  
RESOURCES DEFENSE COUNCIL INC., NRDC ACTION FUND  
CORP., SIERRA CLUB CORP., EARTHJUSTICE CORP., THE UNION  
OF CONCERNED SCIENTISTS INC., THE PEW MEMORIAL TRUST,  
J. HOWARD PEW FREEDOM TRUST, MABEL PEW MYRIN TRUST,  
J.N. PEW JR. CHARITABLE TRUST, THE JOHN D. AND CATHERINE  
T. MACARTHUR FOUNDATION, THE WILLIAM & FLORA  
HEWLETT FOUNDATION, THE DAVID AND LUCILE PACKARD  
FOUNDATION, TIDES FOUNDATION CORPORATION, TIDES  
CENTER CORPORATION, CLIMATEWORKS FOUNDATION, THE  
ENERGY FOUNDATION, and JOHN AND JANE DOES 1-99

*Defendants*

CIVIL CASE NO.

**5:16-cv-211-C**

**PLAINTIFF'S RESPONSE/OPPOSITION TO MOTION TO DISMISS**

**TO THE HONORABLE U.S. DISTRICT COURT:**

This is a Response/Opposition to the Motions to Dismiss by Defendants Friends of Earth International Corp. ("FOEI") and Global Call for Climate Action ("GCCA"), created them joining the Motion to Dismiss #39 and its accompanying Brief #40, filed by Certain Defendants on 10/13/2016. The Court granted their Motions for Leave to Join (#129, #130, and #131) on February 21, 2017. Thus, all the Defendants have appeared before the Court in this lawsuit, and moved the Court to dismiss the lawsuit.

I respectfully request that this Court denies all Defendants' pending Motions to Dismiss in entirety, and provides me all other relief, in law or in equity, to which I am justly entitled.

This response/opposition is supported by an accompanying Brief.

Dated March 1, 2017.

/s/ Leonid Goldstein

Leonid Goldstein, *pro se*

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**CERTIFICATE OF SERVICE**

I hereby certify that on March 1, 2017, I caused the foregoing document to be electronically transmitted to the Clerk of the Court using the ECF system for filing. A Notice of Electronic Filing was transmitted to all ECF registrants.

/s/ Leonid Goldstein

Leonid Goldstein, *pro se*